

1 **UNITED STATES DISTRICT COURT**
2 **WESTERN DISTRICT OF WASHINGTON**
 AT SEATTLE

3 ALMA SUE CROFT, individually and
4 on behalf of all others similarly situated,

5 Plaintiff,

6 v.

Case No. 2:20-cv-01310-RSM

7 SPINX GAMES LIMITED, GRANDE
8 GAMES LIMITED, and BEIJING BOLE
9 TECHNOLOGY CO., LTD.,

Defendants.

10 **DECLARATION OF RYAN BAHRY**
11 **REGARDING SETTLEMENT ADMINISTRATION**

12 I, RYAN BAHRY, declare and state as follows:

13 1. I am an Assistant Director at JND Legal Administration (“JND”). JND is a legal
14 administration services provider with its headquarters located in Seattle, Washington. JND has
15 extensive experience with all aspects of legal administration and has administered settlements in
16 hundreds of class actions.

17 2. JND is serving as the Settlement Administrator¹ in the above-captioned litigation
18 (“Action”), as ordered by the Court in its Amended Order Granting Plaintiff’s Motion for
19 Preliminary Approval of Class Action Settlement Agreement, dated March 31, 2022 (the
20 “Order”).

21
22
23 _____
¹ Capitalized terms used and not otherwise defined herein shall have the meanings given such
terms in the Class Action Settlement Agreement.

CAFA NOTICE

- a. Class Action Complaint, filed September 1, 2020;
- b. First Amended Class Action Complaint, filed April 9, 2021;
- c. Plaintiff's Motion for Preliminary Approval of Class Action Settlement, filed February 15, 2022;
- d. Class Action Settlement Agreement, filed February 15, 2022;
- e. [Proposed] Claim Form, filed February 15, 2022;
- f. [Proposed] Email Notice, filed February 15, 2022;
- g. [Proposed] Postcard Notice, filed February 15, 2022;
- h. [Proposed] Website Notice, filed February 15, 2022;
- i. [Proposed] Plan of Allocation, filed February 15, 2022;
- j. Order Granting Plaintiff's Motion for Preliminary Approval of Class Action Settlement, entered March 24, 2022; and
- k. Amended Order Granting Plaintiff's Motion for Preliminary Approval of Class Action Settlement, entered March 31, 2022.

CLASS MEMBER DATA

6. On April 27, 2022, JND received seven (7) spreadsheets from Defendants for each game application containing, among other information, the Player ID, User ID, purchase amounts, terms of acceptance agreement date, and e-mail address (where applicable) for a total of 95,948 unique Settlement Class Member Player IDs.

7. Between July 26, 2022, and August 11, 2022, JND received a spreadsheet from the Amazon, Apple, and Google platforms, containing, among other information, the names, mailing addresses (where applicable), e-mail addresses (where applicable), and purchase amounts for a total of 87,324 unique Settlement Class Members. JND used the information contained in the platform data to send Notice to Settlement Class Members.

8. Prior to mailing notices, JND analyzed the raw data to consolidate duplicate records within the spreadsheets and determined a total of 87,324 unique Settlement Class Members. Prior to noticing, JND updated the Settlement Class Member contact information (where available) using data from the National Change of Address (“NCOA”) database.² The Settlement Class Member data was promptly loaded into a secure database established for this Action.

DIGITAL AD CAMPAIGN

9. On August 19, 2022, JND caused the digital effort to launch with Google Display Network (“GDN”), Facebook and Instagram. The digital effort concluded on September 15, 2022, delivering 3,330,392 impressions to adults 18 years of age or older in Washington state (“WA Adults 18+”), 130,392 impressions more than what was originally planned. A portion of the impressions

² The NCOA database is the official United States Postal Service (“USPS”) technology product which makes changes of address information available to mailers to help reduce undeliverable mail pieces before mail enters the mail stream. This product is an effective tool to update address changes when a person has completed a change of address form with the USPS. The address information is maintained on the database for 48 months.

1 was targeted toward a custom segment focusing on users who have used similar apps to Cash
2 Frenzy, Lotsa Slots, Jackpot World, Vegas Friends, Jackpot Casino, Cash Bash, and Jackpot Crush
3 on GDN, and a portion was allocated toward users who have visited Facebook gaming and/or
4 showed interest in casino games, Jackpot Party Casino community, and mobile/online gambling
5 on Facebook and Instagram.

6 10. The digital ads were served across all devices (desktop, laptop, tablet and mobile),
7 with an emphasis on mobile. Screenshots of the Digital Notices as they appeared on GDN,
8 Facebook and Instagram are attached as **Exhibit B**.

9 **E-MAIL NOTICE**

10 11. Pursuant to the terms of the Settlement Agreement, on August 19, 2022, JND sent
11 the customized, Court-approved e-mail notice (“E-mail Notice”) via e-mail from an established
12 case inbox (info@GrandeGamesSettlement.com) to 85,432 unique Settlement Class Members
13 with a valid e-mail address (1,892 Settlement Class Members were excluded from the e-mail
14 campaign as they did not have a valid e-mail address). A representative sample of the E-mail
15 Notice is attached hereto as **Exhibit C**.

16 12. As of the date of this Declaration, JND tracked 3,021 E-mail Notices that were
17 returned to JND as undeliverable.

18 **POSTCARD NOTICE**

19 13. Pursuant to the terms of the Settlement Agreement, on August 19, 2022, JND
20 mailed the Court-approved postcard notice (“Postcard Notice”) via USPS first-class mail to 6,704
21 unique Settlement Class Members with a Lifetime Spending Amount greater than \$100.00. A
22 representative sample of the Postcard Notice is attached hereto as **Exhibit D**.

TOLL-FREE INFORMATION LINE

19. On March 31, 2022, JND established a case-specific toll-free number, 1-877-540-0582, for Settlement Class Members to call to obtain information regarding the Settlement. Callers have the option to listen to the Interactive Voice Response (“IVR”) system which directs Settlement Class Members to the Settlement Website. The toll-free number is accessible 24 hours a day, seven (7) days a week.

20. As of the date of this Declaration, the toll-free number has received 71 incoming calls. JND will continue to maintain the toll-free number throughout the settlement administration process.

REQUESTS FOR EXCLUSION

21. The E-mail Notice and Postcard Notice informed recipients that any Class Member who wished to exclude themselves from the proposed Settlement (“opt-out”) must do so by mailing an exclusion letter to the Settlement Administrator, postmarked on or before November 7, 2022.

22. As of the date of this Declaration, JND has received two (2) timely exclusion requests from Class Members Christine Aden (Tumwater, WA) and Joshua McDonald (Portland, OR).

OBJECTIONS

23. The E-mail Notice and Postcard Notice informed recipients that any Class Member who wished to object to the proposed Settlement could do so by filing a written objection with the Court, postmarked on or before November 7, 2022.

24. As of the date of this Declaration, JND has not received, and is not aware of, any objections.

CLAIM FORMS RECEIVED

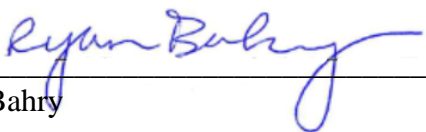
25. The E-mail Notice and Postcard Notice informed recipients that Settlement Class Members must file a Claim Form if they wish to receive a payment from the Settlement, and that those wishing to do so, could file a Claim Form on the Settlement Website, or by mailing a copy of the Claim Form to JND, postmarked or submitted on or before January 26, 2023. A representative sample of the Claim Form is attached hereto as **Exhibit E**.

26. Pursuant to the Settlement, thirty days prior to the Claims Deadline, JND will send Reminder Notice (substantially in the form of Exhibit C hereto) to all Class Members for whom a valid email address is available, with an electronic link to the Claim Form.

27. As of the date of this Declaration, JND has received 3,344 Claim Forms (3,295 electronic and 49 mailed). JND is in the process of receiving, reviewing, and validating the submitted Claim Forms on an ongoing basis.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed November 21, 2022 in Seattle, Washington.



Ryan Bahry

EXHIBIT A



April 8, 2022

United States Attorney General
and the Appropriate Officials
Identified in Attachment A

RE: CAFA Notice of Proposed Class Action Settlement

Dear Sir or Madam:

This Notice is being provided to you in accordance with the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715 on behalf of SpinX Games Limited, Grande Games Limited, and Beijing Bole Technology Co., Ltd., the defendants in the below-referenced class action ("the Action"). Plaintiff's Motion for Preliminary Approval of Class Action Settlement was filed with the Court on February 15, 2022, and the Court entered its Order Granting Plaintiff's Motion for Preliminary Approval of Class Action Settlement on March 24, 2022. The Court has scheduled the final settlement approval hearing on September 8, 2022 at 9:00 a.m.

Case Name:	<i>Heathcote v. SpinX Games Limited, et al.</i>
Case Number:	2:20-cv-01310-RSM
Jurisdiction:	United States District Court for the Western District of Washington
Date Settlement filed with Court:	February 15, 2022

Copies of all materials filed in the above-named actions are electronically available on the Court's Pacer website found at <https://pcl.uscourts.gov>. Additionally, in compliance with 28 U.S.C. § 1715(b), the enclosed CD-ROM contains the following documents filed in the Action:

01 - Complaint.pdf

Class Action Complaint, filed September 1, 2020

02 - Amended Complaint.pdf

First Amended Class Action Complaint, filed April 9, 2021

03 - Motion for Preliminary Approval.pdf

Plaintiff's Motion for Preliminary Approval of Class Action Settlement, filed February 15, 2022

04 - Settlement Agreement.pdf

Class Action Settlement Agreement, filed February 15, 2022

05 - Claim Form.pdf

[Proposed] Claim Form, filed on February 15, 2022

06 - Email Notice.pdf

[Proposed] Email Notice, filed on February 15, 2022

07 - Postcard Notice.pdf

[Proposed] Postcard Notice, filed on February 15, 2022

08 - Website Notice.pdf

[Proposed] Website Notice, filed February 15, 2022

09 - Plan of Allocation.pdf

[Proposed] Plan of Allocation, filed February 15, 2022

10 - Preliminary Approval Order.pdf

Order Granting Plaintiff's Motion for Preliminary Approval of Class Action Settlement, entered March 24, 2022

11 - Amended Preliminary Approval Order.pdf

Amended Order Granting Plaintiff's Motion for Preliminary Approval of Class Action Settlement, entered March 31, 2022

It is not possible to provide a breakdown of the Settlement Class in accordance with 28 U.S.C. § 1715 (b)(7) at this time. However, we anticipate that the Settlement Class is sufficiently numerous as to include Class Members potentially residing in all 50 U.S. states, as well as the District of Columbia, and may include Class Members residing in U.S. territories and associated states.

There are no other settlements or agreements made between Counsel for the parties related to the class defined in the proposed settlement, and as of the date of this Notice, no Final Judgment or notice of dismissal has been entered in this case.

If you have any questions regarding the details of the case and settlement, please contact Defense Counsel's representative at:

Ajay S. Krishnan
Michelle Ybarra
Keker, Van Nest & Peters LLP
633 Battery Street
San Francisco, CA 94111
Tel: (415) 391-5400
akrishnan@keker.com
mybarra@keker.com

For questions regarding this Notice, please contact JND at:

JND Class Action Administration
1100 2nd Ave, Suite 300
Seattle, WA 98101
Phone: 800-207-7160

Regards,

JND Legal Administration

Encl.

Treg R. Taylor
Office of the Attorney General
1031 W 4th Ave
Ste 200
Anchorage, AK 99501

Steve Marshall
Attorney General's Office
501 Washington Ave
Montgomery, AL 36104

Leslie Rutledge
Office of the Attorney General
323 Center St
Ste 200
Little Rock, AR 72201

Mark Brnovich
Office of the Attorney General
2005 N Central Ave
Phoenix, AZ 85004

CAFA Coordinator
Office of the Attorney General
Consumer Protection Section
455 Golden Gate Ave., Ste 11000
San Francisco, CA 94102

Phil Weiser
Office of the Attorney General
Ralph L. Carr Judicial Building
1300 Broadway, 10th Fl
Denver, CO 80203

William Tong
Office of the Attorney General
165 Capitol Ave
Hartford, CT 06106

Kathy Jennings
Delaware Department of Justice
Carvel State Office Building
820 N French Street
Wilmington, DE 19801

Ashley Moody
Office of the Attorney General
State of Florida
PL-01 The Capitol
Tallahassee, FL 32399

Chris Carr
Office of the Attorney General
40 Capitol Sq SW
Atlanta, GA 30334

Holly T. Shikada
Department of the Attorney General
425 Queen Street
Honolulu, HI 96813

Thomas J. Miller
Office of the Attorney General
Hoover State Office Building
1305 E. Walnut Street Rm 109
Des Moines, IA 50319

Lawrence G. Wasden
Office of the Attorney General
700 W. Jefferson St, Suite 210
Boise, ID 83720

Kwame Raoul
Office of the Attorney General
James R. Thompson Center
100 W. Randolph St
Chicago, IL 60601

Todd Rokita
Office of the Attorney General
Indiana Government Center South
302 W Washington St 5th Fl
Indianapolis, IN 46204

Derek Schmidt
Office of the Attorney General
120 SW 10th Ave
2nd Fl
Topeka, KS 66612

Daniel Cameron
Office of the Attorney General
Capitol Building
700 Capitol Ave Ste 118
Frankfort, KY 40601

Jeff Landry
Office of the Attorney General
1885 N. Third St
Baton Rouge, LA 70802

CAFA Coordinator
General Counsel's Office
Office of Attorney General
One Ashburton Pl, 20th Floor
Boston, MA 02108

Brian E. Frosh
Office of the Attorney General
200 St. Paul Pl
Baltimore, MD 21202

Aaron Frey
Office of the Attorney General
6 State House Station
Augusta, ME 04333

Dana Nessel
Department of Attorney General
G. Mennen Williams Building, 7th Fl
525 W Ottawa St
Lansing, MI 48933

Keith Ellison
Office of the Attorney General
445 Minnesota St
Suite 1400
St. Paul, MN 55101

Eric Schmitt
Attorney General's Office
Supreme Court Building
207 W High St
Jefferson City, MO 65101

Lynn Fitch
Office of the Attorney General
Walter Sillers Building
550 High St Ste 1200
Jackson, MS 39201

Austin Knudsen
Office of the Attorney General
Justice Building, Third Fl
215 N. Sanders
Helena, MT 59601

Josh Stein
Attorney General's Office
114 W Edenton St
Raleigh, NC 27603

Drew H. Wrigley
Office of the Attorney General
State Capitol, 600 E Boulevard Ave
Dept. 125
Bismarck, ND 58505

Doug Peterson
Attorney General's Office
2115 State Capitol
Lincoln, NE 68509

John Formella
Office of the Attorney General
NH Department of Justice
33 Capitol St.
Concord, NH 03301

Matthew J. Platkin
Office of the Attorney General
Richard J. Hughes Justice Complex
25 Market St 8th Fl, West Wing
Trenton, NJ 08611

Hector Balderas
Office of the Attorney General
Villagra Building
408 Galisteo Street
Santa Fe, NM 87501

Aaron Ford
Office of the Attorney General
Old Supreme Court Building
100 N Carson St
Carson City, NV 89701

CAFA Coordinator
Office of the Attorney General
28 Liberty St
15th Fl
New York, NY 10005

Dave Yost
Attorney General's Office
State Office Tower
30 E Broad St 14th Fl
Columbus, OH 43215

John O'Connor
Office of the Attorney General
313 NE 21st St
Oklahoma City, OK 73105

Ellen F. Rosenblum
Oregon Department of Justice
Justice Building
1162 Court St NE
Salem, OR 97301

Josh Shapiro
PA Office of the Attorney General
Strawberry Square 16th Fl
Harrisburg, PA 17120

Peter F. Neronha
Office of the Attorney General
150 S Main St
Providence, RI 02903

Alan Wilson
Office of the Attorney General
Rembert C. Dennis Bldg
1000 Assembly St Rm 519
Columbia, SC 29201

Jason Ravensborg
Office of the Attorney General
1302 E Highway 14
Ste 1
Pierre, SD 57501

Herbert H. Slatery, III
Office of the Attorney General
500 Dr Martin L King Jr Blvd
Nashville, TN 37219

Ken Paxton
Office of the Attorney General
300 W. 15th St
Austin, TX 78701

Sean D. Reyes
Office of the Attorney General
Utah State Capitol Complex
350 North State St Ste 230
Salt Lake City, UT 84114

Jason S. Miyares
Office of the Attorney General
202 N. Ninth St.
Richmond, VA 23219

T.J. Donovan
Attorney General's Office
109 State St.
Montpelier, VT 05609

Bob Ferguson
Office of the Attorney General
1125 Washington St SE
Olympia, WA 98501

Josh Kaul
Attorney General's Office
P.O. Box 7857
Madison, WI 53707

Patrick Morrissey
Office of The Attorney General
State Capitol, 1900 Kanawha Blvd E
Building 1 Rm E-26
Charleston, WV 25305

Bridget Hill
Office of the Attorney General
State Capitol Building
200 W 24th St
Cheyenne, WY 82002

Karl A. Racine
Office of the Attorney General
400 6th St NW
Washington, DC 20001

Merrick Garland
Office of the U.S. Attorney General
U.S. Department of Justice
950 Pennsylvania Ave NW
Washington, DC 20530

Fainu'uilelei Falefatu Ala'ilima-Utu
Department of Legal Affairs
Exec Ofc Bldg, 3rd Fl
P.O. Box 7
Utulei, AS 96799

Leevin Taitano Camacho
Office of the Attorney General
Administration Division
590 S Marine Corps Dr, Suite 901
Tamuning, GU 96913

Edward Manibusan
Office of the Attorney General
Administration Building
P.O. Box 10007
Saipan, MP 96950

Domingo Emanuelli Hernández
Dpto. de Justicia de Puerto Rico
Calle Teniente César González 677
Esq. Ave. Jesús T. Piñero
San Juan, PR 00918

CAFA Notice – Attachment A – Service List

Denise N. George
Office of the Attorney General
3438 Kronprindsens Gade
GERS Building 2nd Fl
St. Thomas, VI 00802

Joses R. Gallen
Department of Justice
P.O. Box PS-105
Palikir
Pohnpei State, FM 96941

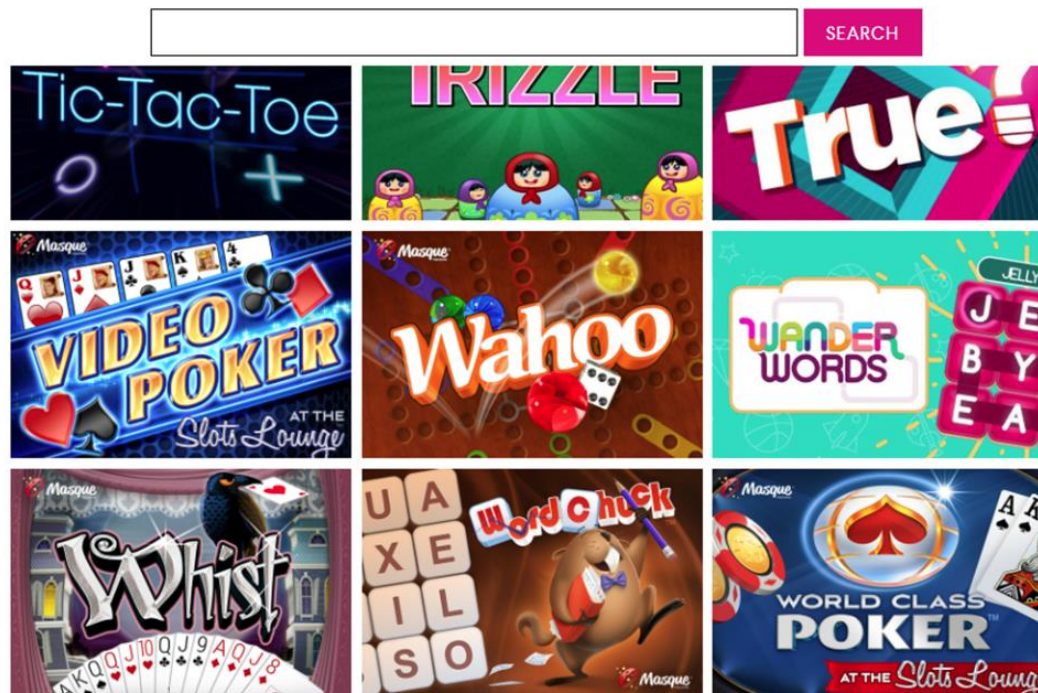
Richard Hickson, Attorney General
C/O Marshall Islands Embassy
2433 Massachusetts Ave NW
Washington, DC 20008

Ernestine K. Rengiil
Office of the Attorney General
P.O. Box 1365
Koror, PW 96940

EXHIBIT B

Aol.

- Enter City/Zip
- Mail
- Login / Join
- News
- Entertainment
- Finance
- Lifestyle
- Sports
- Games
- Subscriptions



LEGAL NOTICE

If you played certain social casino-style games while in WA State, you may get cash from a class action settlement

FILE A CLAIM

JND

Aol. Games

[Join AOL](#) [Downloads](#) [Help](#) [Feedback](#)



TheSolitaire.com Solitaire

Klondike (single) Turn One

Solitaire Spider FreeCell Klondike Mahjong JigsawPuzzles Sudoku English

TURN 1 TURN 3

ZOOM

LEGAL NOTICE
If you played certain social casino-style games while in WA State, you may get cash from a class action settlement
FILE A CLAIM

LEGAL NOTICE
If you played certain social casino-style games while in WA State, you may get cash from a class action settlement
FILE A CLAIM

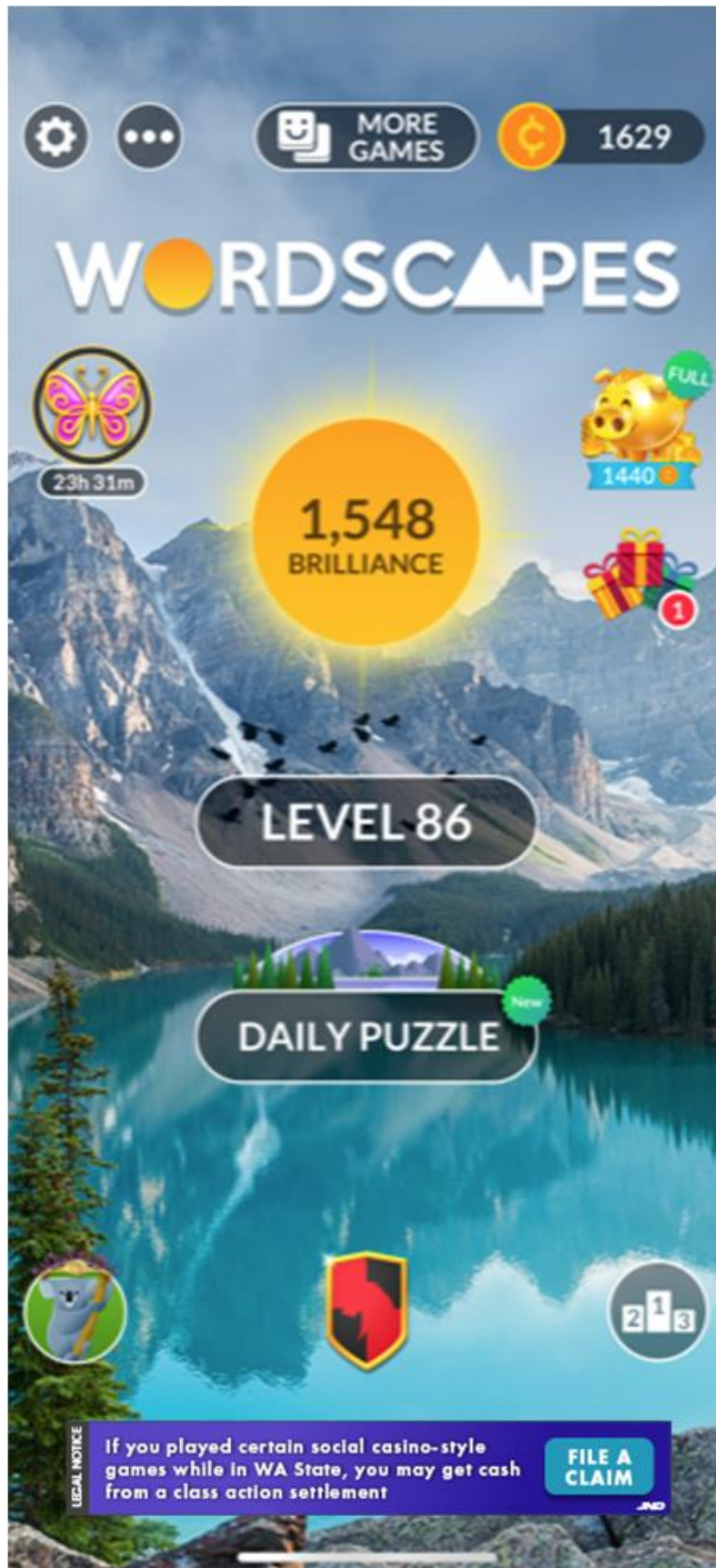
LEGAL NOTICE
If you played certain social casino-style games while in WA State, you may get cash from a class action settlement
FILE A CLAIM

TIME 00:06 CARDS 24 MOVES 3

CHOOSE GAME DEAL NEW

Detailed description of the game state: The waste pile is a red patterned card. The tableau has four piles: the first pile has the Ace of Spades; the second and third piles are empty; the fourth pile has three hearts (bottom to top: 8 of Hearts, 5 of Hearts, 6 of Spades). The stock has three piles: the first pile has the King of Diamonds; the second pile has the King of Hearts; the third pile has the King of Spades. The top bar shows 'TURN 1' and 'TURN 3' buttons, a 'ZOOM' control, and a language selector set to 'English'. The bottom bar shows 'TIME 00:06', 'CARDS 24', 'MOVES 3', and buttons for 'CHOOSE GAME' and 'DEAL NEW'. Three legal notices are on the right side of the screen.



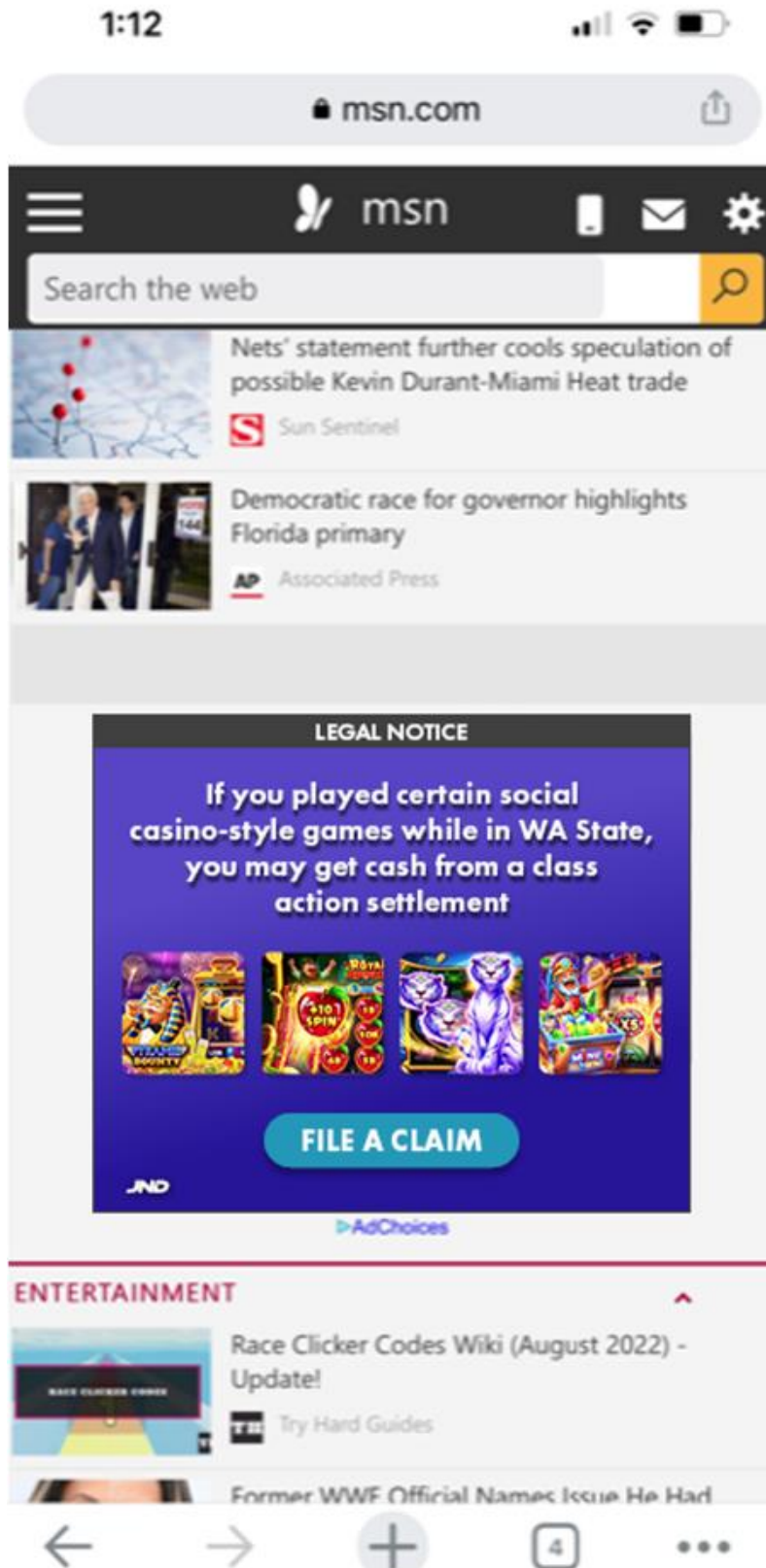


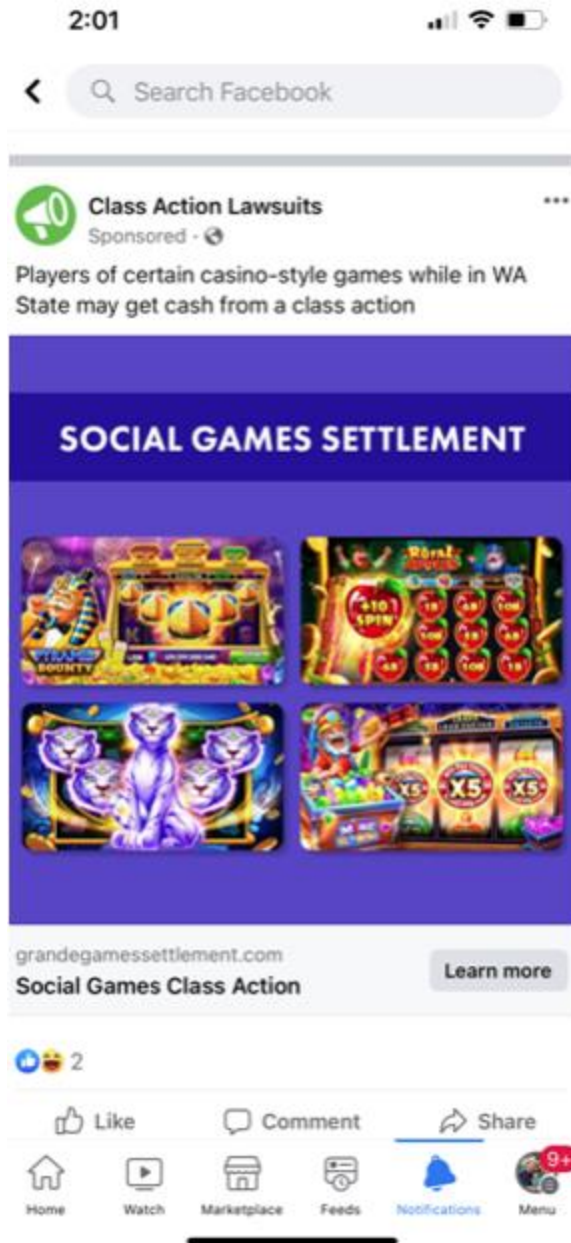
LEGAL NOTICE

If you played certain social casino-style games while in WA State, you may get cash from a class action settlement


FILE A CLAIM

JND





10:26




Class Action Lawsuits
Sponsored

...

×

SOCIAL GAMES SETTLEMENT





Players of social casino-style games while
in WA State may get cash


^

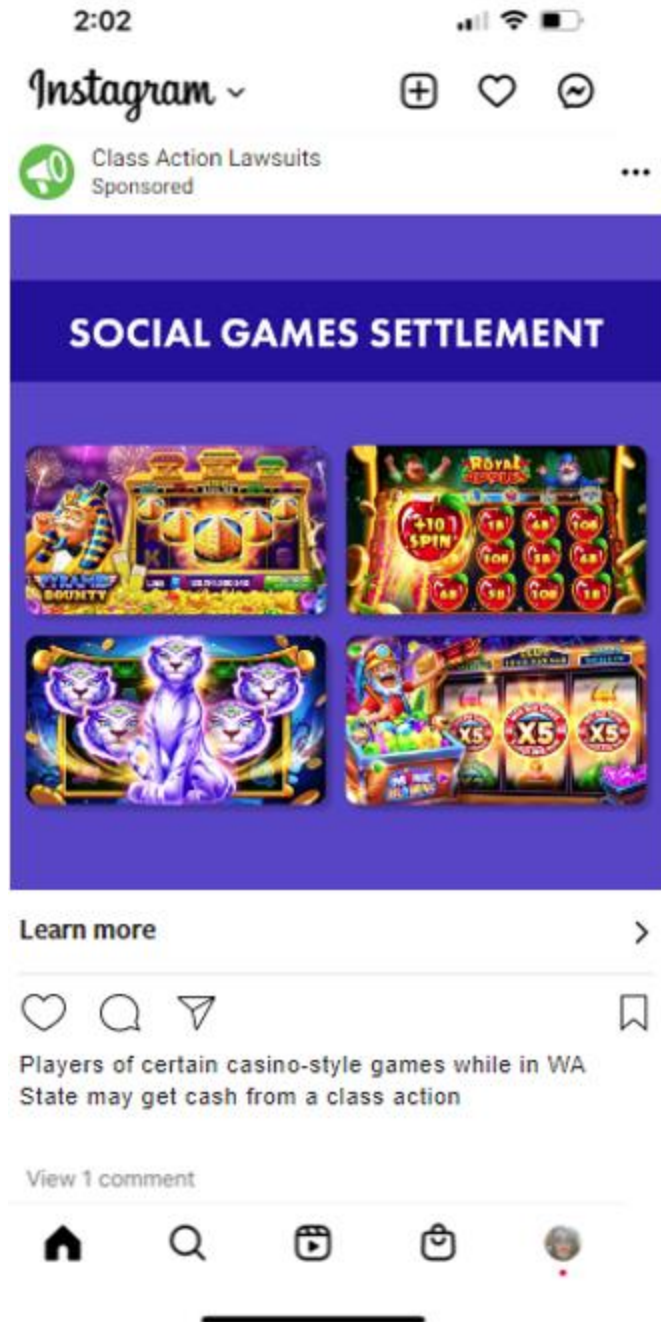
Learn more

Send message...











2:02

 **Class Action Lawsuits**
Sponsored

...

X

SOCIAL GAMES SETTLEMENT




Pyramid Fortune

Royal Reels

Wild Tigers

Mega Moolah

Players of social casino-style games
while in WA State may get cash



Learn more

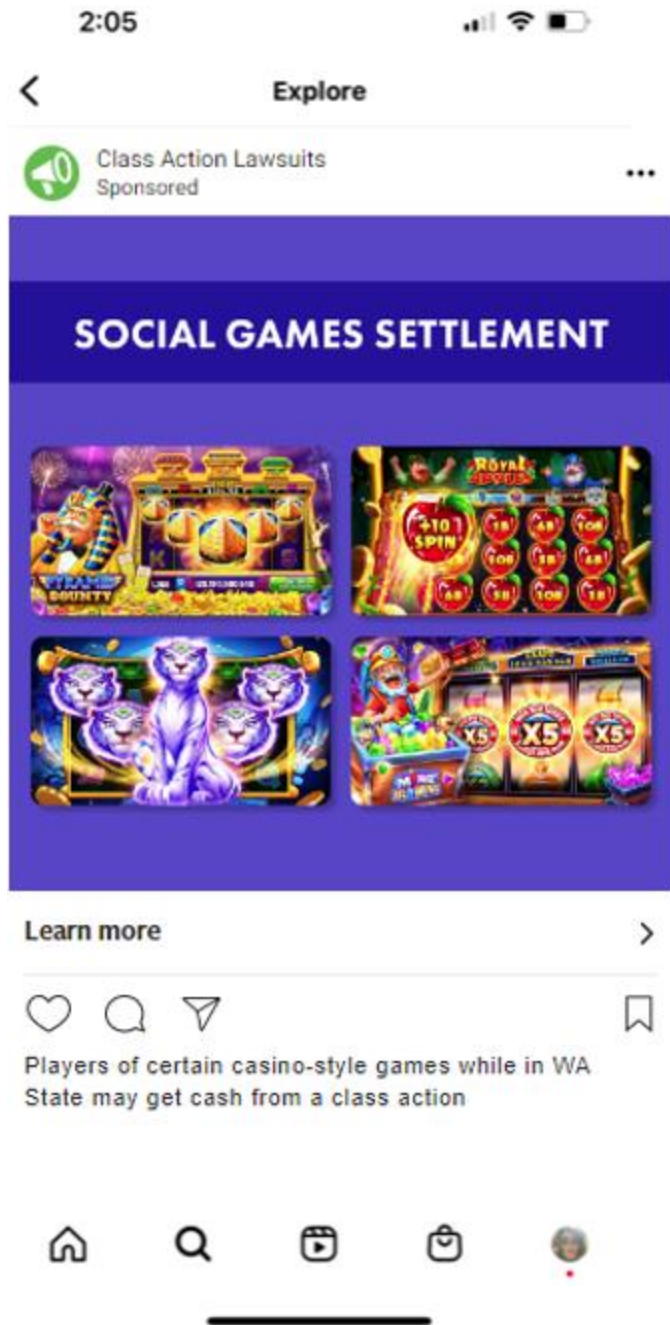


EXHIBIT C

From: Jennifer@GrandeGamesSettlement.com
To: JonQClassMember@domain.com
Re: Legal Notice of Class Action Settlement

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT
Heathcote v. SpinX Games Limited, et al., Case No. 2:20-cv-01310-RSM
(United States District Court for the Western District of Washington)

Unique ID: [Name Number]

If you played Cash Frenzy, Lotsa Slots, Jackpot World, Vegas Friends, Jackpot Mania, Jackpot Fever, Cash Bash, or Jackpot Crush you may be part of a class action settlement

A court authorized this notice. You are not being sued. This is not a solicitation from a lawyer.

This notice is to inform you of the settlement of a class action lawsuit against SpinX Games Limited, Grande Games Limited, and Beijing Bole Technology Co., Ltd. (“Defendants”), alleging claims based on the sale of virtual chips in the following social casino-style games: Cash Frenzy, Lotsa Slots, Jackpot World, Vegas Friends, Jackpot Mania, Jackpot Fever, DAFU, Cash Bash, and Jackpot Crush. Defendants deny all claims and that they violated the law, but have agreed to the settlement to avoid the uncertainties and expenses associated with continuing the case.

Am I a Class Member? Our records indicate you may be a Settlement Class Member. Settlement Class Members are persons who played Cash Frenzy, Lotsa Slots, Jackpot World, Vegas Friends, Jackpot Mania, Jackpot Fever, DAFU, Cash Bash, and Jackpot Crush, on or before January 31, 2022, while located in the state of Washington.

What Can I Get? If approved by the Court, Defendants will establish a Settlement Fund of \$3,500,000 to pay all valid claims submitted by the Settlement Class, together with notice and administration expenses as well as any attorneys’ fees, costs, and incentive award to the Class Representative awarded by the Court. If you are entitled to relief, you may submit a claim to receive a share of the Settlement Fund. Your share will be depend on, among other things, (1) the total dollar amount of in-game purchases you made while playing the Cash Frenzy, Lotsa Slots, Jackpot World, Vegas Friends, and/or other SpinX Social Casino Games, with those who spent more money receiving a higher percentage back, (2) whether or not your claims are potentially subject to the Dispute Resolution and Arbitration Provision in Defendants’ Terms of Service, and (3) how many Settlement Class Members submit claims. You can find more information, and estimate your share of the Settlement Fund, at www.GrandeGamesSettlement.com.

How Do I Get a Payment? To receive a payment, you must submit a timely and complete Claim Form by mail or online, submitted or postmarked **no later than January 26, 2023**. You can submit the claim form online at www.GrandeGamesSettlement.com. You may also request a paper claim form and mail it to Grande Games Settlement, c/o JND Legal Administration, P.O. Box 91221, Seattle, WA 98111.

What are My Other Options? You may exclude yourself from the Class by sending a letter to the settlement administrator no later than **November 7, 2022**. If you exclude yourself, you cannot get a settlement payment, but you keep any rights you may have to sue the Defendants over the legal issues in the lawsuit. You and/or your lawyer have the right to appear before the Court and/or object to the proposed settlement. Your written objection must be filed no later than **November 7, 2022**. Specific instructions about how to object to, or exclude yourself from, the Settlement are available at www.GrandeGamesSettlement.com. If you file a claim or do nothing, and the Court approves the Settlement, you will be bound by all of the Court's orders and judgments. In addition, your claims relating to the allegations in this case against Defendants and any other Released Parties will be released.

Who Represents Me? The Court has appointed lawyers from Bursor & Fisher, P.A. to represent the class. These attorneys are called "Class Counsel." You will not be charged for these lawyers. If you want to be represented by your own lawyer in this case, you may hire one at your expense. Plaintiff Alma Sue Croft is a Settlement Class Member and the Court appointed her as "Class Representative."

When Will the Court Consider the Proposed Settlement? The Court will hold the Final Approval Hearing at **9:00 a.m. PST on December 1, 2022** in United States District Court for the Western District of Washington, 700 Stewart Street, Seattle, WA 98101. At that hearing, the Court will: hear any objections concerning the fairness of the settlement; determine the fairness of the settlement; decide whether to approve Class Counsel's request for attorneys' fees and costs; and decide whether to award the Class Representative \$5,000 from the Settlement Fund for his services in helping to bring and settle this case. Class Counsel will be paid from the Settlement Fund in an amount to be determined and awarded by the Court. Class Counsel will seek no more than 25% of the Settlement Fund in attorneys' fees, plus reimbursement of reasonable costs and expenses, but the Court may award less than this amount.

How Do I Get More Information? For more information, including a more detailed Notice, Claim Form, a copy of the Settlement Agreement and other documents, go to www.GrandeGamesSettlement.com, contact the settlement administrator at 1-877-540-0582 or Grande Games Settlement, c/o JND Legal Administration, P.O. Box 91221, Seattle, WA 98111, or call Class Counsel at 1-646-837-7150.

EXHIBIT D

COURT AUTHORIZED NOTICE OF CLASS ACTION
AND PROPOSED SETTLEMENT

**If you played Cash Frenzy,
Lotsa Slots, Jackpot World,
Vegas Friends, and/or other
SpinX Social Casino Games,
you may be part of a class
action settlement.**

A settlement has been reached in a class action lawsuit against SpinX Games Limited, Grande Games Limited, and Beijing Bole Technology Co., Ltd. (“Defendants”), alleging claims based on the sale of virtual chips in the following social casino-style games: Cash Frenzy, Lotsa Slots, Jackpot World, Vegas Friends, Jackpot Mania, Jackpot Fever, DAFU, Cash Bash, and Jackpot Crush. Defendants deny all claims and that they violated the law, but have agreed to the settlement to avoid the uncertainties and expenses associated with continuing the case.

Grande Games Settlement
c/o JND Legal Administration
P.O. Box 91221
Seattle, WA 98111



Unique ID: XXXXXX

Postal Service: Please do not mark barcode

NAME

ADDRESS

CITY, STATE ZIP

By Order of the Court Dated: March 24, 2022

Am I a Class Member? Our records indicate you may be a Settlement Class Member. Settlement Class Members are persons who played Cash Frenzy, Lotsa Slots, Jackpot World, Vegas Friends, Jackpot Mania, Jackpot Fever, DAFU, Cash Bash, and Jackpot Crush, on or before January 31, 2022, while located in the state of Washington.

What Can I Get? If approved by the Court, Defendants will establish a Settlement Fund of \$3,500,000 to pay all valid claims submitted by the Settlement Class, together with notice and administration expenses as well as any attorneys' fees, costs, and incentive award to the Class Representative awarded by the Court. If you are entitled to relief, you may submit a claim to receive a share of the Settlement Fund. Your share will be depend on, among other things, (1) the total dollar amount of in-game purchases you made while playing the Cash Frenzy, Lotsa Slots, Jackpot World, Vegas Friends, and/or other SpinX Social Casino Games, with those who spent more money receiving a higher percentage back, (2) whether or not your claims are potentially subject to the Dispute Resolution and Arbitration Provision in Defendants' Terms of Service, and (3) how many Settlement Class Members submit claims. You can find more information, and estimate your share of the Settlement Fund, at www.GrandeGamesSettlement.com.

How Do I Get a Payment? To receive a payment, you must submit a timely and complete Claim Form by mail or online, submitted or postmarked **no later than January 26, 2023**. You can submit the claim form online at www.GrandeGamesSettlement.com. You may also request a paper claim form and mail it to Grande Games Settlement, c/o JND Legal Administration, P.O. Box 91221, Seattle, WA 98111.

What are My Other Options? You may exclude yourself from the Class by sending a letter to the settlement administrator no later than **November 7, 2022**. If you exclude yourself, you cannot get a settlement payment, but you keep any rights you may have to sue the Defendants over the legal issues in the lawsuit. You and/or your lawyer have the right to appear before the Court and/or object to the proposed settlement. Your

written objection must be filed no later than **November 7, 2022**. Specific instructions about how to object to, or exclude yourself from, the Settlement are available at www.GrandeGamesSettlement.com. If you file a claim or do nothing, and the Court approves the Settlement, you will be bound by all of the Court's orders and judgments. In addition, your claims relating to the allegations in this case against Defendants and any other Released Parties will be released.

Who Represents Me? The Court has appointed lawyers from Bursor & Fisher, P.A. to represent the class. These attorneys are called "Class Counsel." You will not be charged for these lawyers. If you want to be represented by your own lawyer in this case, you may hire one at your expense. Plaintiff Alma Sue Croft is a Settlement Class Member and the Court appointed her as "Class Representative."

When Will the Court Consider the Proposed Settlement? The Court will hold the Final Approval Hearing at **9:00 a.m. PST on December 1, 2022** in the United States District Court for the Western District of Washington, 700 Stewart Street, Seattle, WA 98101. At that hearing, the Court will: hear any objections concerning the fairness of the settlement; determine the fairness of the settlement; decide whether to approve Class Counsel's request for attorneys' fees and costs; and decide whether to award the Class Representative \$5,000 from the Settlement Fund for his services in helping to bring and settle this case. Class Counsel will be paid from the Settlement Fund in an amount to be determined and awarded by the Court. Class Counsel will seek no more than 25% of the Settlement Fund in attorneys' fees, plus reimbursement of reasonable costs and expenses, but the Court may award less than this amount.

How Do I Get More Information? For more information, including a more detailed Notice, Claim Form, a copy of the Settlement Agreement and other documents, go to www.GrandeGamesSettlement.com, contact the settlement administrator at 1-877-540-0582 or Grande Games Settlement, c/o JND Legal Administration, P.O. Box 91221, Seattle, WA 98111, or call Class Counsel at 1-646-837-7150.

EXHIBIT E

GRANDE GAMES SETTLEMENT CLAIM FORM

THIS CLAIM FORM MUST BE SUBMITTED ONLINE OR POSTMARKED BY **JANUARY 26, 2023**. THE CLAIM FORM MUST BE SIGNED AND MEET ALL CONDITIONS OF THE SETTLEMENT AGREEMENT.

The Settlement Administrator will review your Claim Form. If accepted, you will receive a share of the Settlement Fund. This process takes time, please be patient. If you have any questions, or would like to estimate your share of the Settlement Fund, visit: www.GrandeGamesSettlement.com.

Instructions: Fill out each section of this form and sign where indicated. To find your Player ID(s), selecting the “Settings” menu and look for the “Player ID” at the bottom of the page.

First Name		Last Name	
Street Address			
City		State	ZIP Code
Email Address			Phone Number
Cash Frenzy Player ID(s) <i>(only complete if you have played this game)</i>	Lotsa Slots Player ID(s) <i>(only complete if you have played this game)</i>	Jackpot World Player ID(s) or Other SpinX Games Social Casino Game ID(s) <i>(only complete if you have played these game(s))</i>	
All email addresses associated with Cash Frenzy, Lotsa Slots, Jackpot World, and/or other SpinX Games Social Casino Games accounts.			
All email addresses associated with Facebook (App Center), Apple (App Store), Google (Play Store), and Amazon (Appstore), accounts from which you played Cash Frenzy, Lotsa Slots, Jackpot World, and/or other SpinX Games Social Casino Game.			

Settlement Class Member Affirmation:

By submitting this Claim Form you affirm under penalty of perjury that, to the best of your knowledge, the Player ID(s) and email address(es) listed above are yours.

Signature: _____ Date: _____ / _____ / _____

Unique ID: _____

Select Payment Method:

Select **ONE** box for how you would like to receive payment and provide the requested information.

Check	Venmo®	PayPal®
Mailing Address:	Email Address:	Email Address: